

GARIN LAW GROUP  
 JOSEPH P. GARIN, ESQ.  
 Nevada Bar No. 6653  
 9900 Covington Cross Drive, Suite 210  
 Las Vegas, Nevada 89144  
 Phone: (702) 382-1500  
 Fax: (702) 382-1512  
[jgarin@garinlawgroup.com](mailto:jgarin@garinlawgroup.com)

*Attorneys for Defendant  
 Nevada Heart & Vascular Center, LLP*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

GIA NGUYEN, individually and on behalf of  
 all others similarly situated,

Plaintiff,

vs.

NEVADA HEART & VASCULAR CENTER,  
 LLP et al.

Defendants,

Case No: 2:25-cv-1134-GMN-EJY

**STIPULATION TO EXTEND  
 DEFENDANT'S TIME TO RESPOND  
 TO COMPLAINT (FIRST REQUEST)**

Pursuant to LR IA 6-1 AND 6-2, Plaintiff, Gia Nguyen ("Plaintiff") and Defendant, Nevada Heart & Vascular Center, LLP ("NHVC") (altogether, the "Parties"), hereby stipulate and agree to extend NHVC's response date to Plaintiff's Class Action Complaint up to and including August 25, 2025.<sup>1</sup> The Parties further state:

WHEREAS, Plaintiff commenced this action by filing a Class Action Complaint on June 24, 2025 in the United States District Court for the District of Nevada against NHVC [Doc. 1]. On July 3, 2025, a representative of NHVC was personally served with the Complaint [Doc. 14]. Accordingly, NHVC's current response date is July 24, 2025, pursuant to Federal Rule of Civil Procedure 81(c)(2)(C).

WHEREAS, this is the first stipulation for extension of NHVC's time to file a response to Plaintiff's Class Action Complaint;

<sup>1</sup> Thirty days falls on Saturday, August 23.

1 WHEREAS This matter is one of four (4) currently known related putative class  
 2 actions recently filed in this Court against NHVC, all arising out of a data incident  
 3 suffered by Defendant Effortless Office Enterprises, LLC. Those actions are (1) Laurana  
 4 Smith v. Effortless Office Enterprises, LLC, et al. (2:25-cv-01123); (2) Gia Nguyen v.  
 5 Effortless Office Enterprises, LLC, et al. (2:25-cv-01134); (3) Rick Obringer v. Effortless  
 6 Office Enterprises, LLC, et al. (2:25-cv-01142); and (4) Lori Wallis v. Effortless Office  
 7 Enterprises, LLC, et al. (2:25-cv-01149).<sup>2</sup>

8 WHEREAS, Counsel for NHVC has conferred with counsel for Plaintiff and  
 9 understands that plaintiffs for these matters intend to seek consolidation. Accordingly,  
 10 the Parties request this Stipulated Extension to allow time for the plaintiffs in these  
 11 related actions to seek consolidation and file a consolidated class action complaint to  
 12 which NHVC may then respond.

13 //

14 //

15 //

16 //

17 //

18 //

19 //

20 //

21 //

22 //

23 //

24 //

25 //

26 //

27 \_\_\_\_\_  
 28 <sup>2</sup> There are two additional related matters filed solely against Effortless Office Enterprises, LLC: Waudby v. Effortless Office Enterprises, LLC (2:25-cv-1135) and Russo v. Effortless Office Enterprises, LLC (2:25-cv-1145).

1 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, that:

2 1. Defendant NHVC's deadline to file a response to Plaintiff's Class  
3 Action Complaint shall be extended up to and including August 25,  
4 2025.

5 IT IS SO STIPULATED.

6  
7 DATED this 21<sup>st</sup> day of July, 2025.

8 STRANCH, JENNINGS &  
9 GARVEY PLLC

GARIN LAW GROUP

10 By: /s/ Jeff Ostrow  
11 NATHAN R. RING, ESQ.  
12 Nevada Bar No. 12078  
13 3100 W. Charleston Blvd.  
14 Ste. 208  
15 Las Vegas, NV 89102  
16 nring@stranchlaw.com

By: Joseph P. Garin  
JOSEPH P. GARIN, ESQ.  
Nevada Bar No. 6653  
9900 Covington Cross Drive  
Ste. 210  
Las Vegas, NV 89144  
[jgarin@garinlawgroup.com](mailto:jgarin@garinlawgroup.com)

14 KOPELOWITZ OSTROW P.A.  
15 Jeff Ostrow, Esq.  
16 One West Las Olas Blvd.,  
17 Ste. 500  
18 Ft. Lauderdale, FL 33301  
19 ostrow@kolawyers.com

MULLEN COUGHLIN, LLC  
Paulyne Gardner, Esq.\*  
Bianca A. Valcarce, Esq.\*  
426 W. Lancaster Ave.,  
Ste. 200

18 *Attorneys for Plaintiff*  
19 *Gia Nguyen*

Devon, PA 19333  
\*pro hac vice forthcoming

*Attorneys for Defendant Nevada  
Heart & Vascular Center, LLP*

22  
23 IT IS SO ORDERED:

24 Raymond J. Zouchak  
25 UNITED STATES MAGISTRATE JUDGE

26 Date: July 21, 2025  
27  
28